

NATURAL RESOURCES COMMISSION

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STATE OF MICHIGAN



JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

December 12, 1985

Mr. J. D. Unis, Plant Manager  
Chrysler Corporation  
Warren Stamping Plant  
22800 Mound Road  
Warren, Michigan 48901

Re: MID 980700868

Dear Mr. Unis:

This letter is to acknowledge receipt of Mr. Becker's letter dated November 21, 1985, indicating your compliance program for RCRA deficiencies cited during my inspection on October 31, 1985. I consider the response acceptable at this time and will evaluate the adequacy of your program during future inspections.

Thank you for your staff's cooperation. If you have any questions, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script that reads "Larry AuBuchon".

Larry AuBuchon  
HAZARDOUS WASTE DIVISION

LA:m7m

cc: U.S. EPA, Region V  
B. Okwumabua



November 21, 1985

Mr. Larry L. AuBuchon  
Hazardous Waste Division  
S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

Re: Reference to your inspection of November 4, 1985 and non--  
compliance with requirements of Subtitle "C" of the Resource  
Conservation and Recovery Act (RCRA) as amended.

Dear Mr. AuBuchon:

Attached is the actions that have been taken to correct the  
non-conformance of related to your inspection.

If there are any questions, feel free to contact me at anytime.

Thank you,

*T.D. Becker*  
T. D. Becker - Manager  
Manufacturing Engineering

pd

Attachment

cc: J. D. Unis  
G. A. Sattelmeier  
P. R. Gilezan  
R. F. Hurliman  
R. A. Cholish  
J. R. Dunahay

NOV 22 1985  
HAZARDOUS WASTE



it starts  
with **ME**

## Inter Company Correspondence

File Code

Date

November 20, 1985

To—Name & Department

Division

Plant/Office

CIMS Number

T. D. Becker Manager Manufacturing Engineering

W.S.P.

448-12-00

From—Name & Department

Division

Plant/Office

CIMS Number

J. R. Dunahay Manager Facilities Engineering

W.S.P.

448-18-00

Subject:

MICHIGAN DEPARTMENT OF NATURAL RESOURCES

(RCRA) INSPECTION REPORT DATED 11/4/85

Above inspection was conducted by Mr. L. Aubuchon, Hazardous Waste Division.

I should like to address each violation in the inspection report.

1. A hazardous waste container in the "waste consolidation area" was not stored closed as required in 40 CFR 265.173. Additionally, the words "Hazardous Waste" must be affixed to the container prior to receiving wastes.

- 1a. A container was in the process of being charged with spent industrial adhesive in waste consolidation area and was left uncovered while unattended and was not yet labeled as hazardous waste.

Responsible employee's were reinstructed to label containers immediately upon accumulation of waste materials and to secure containers with lids or bungs when partial fills are left unattended.

2. The personnel training records must be updated to include a listing of individuals who require training in handling hazardous waste. This will assist in determining if all required training for personnel is completed.

- 2a. Separate lists were compiled for hourly and salary personnel attending training sessions in April 1985. The lists contained name, department, badge, and classifications of each employee. Documentation was placed in each employee's personnel file that attended a training session so that a permanent record would be available for audit purposes.

This list has been updated since Mr. Aubuchon's visit and all employee's contained, thereon, will be scheduled to attend the next session of Hazardous Waste training. (Jan. 1985)

Other remarks in Mr. Aubuchon's report, not noted as violations, but are addressed as follows:

- A. 4a1 Container in Paint Shop not dated.

- A1. Container was labeled hazardous and filled out, but not dated. Label was dated and responsible employees reinstructed to date hazardous waste labels immediately upon accumulation of hazardous waste.

B. 4avi Waste adhesive should be scrapped off of drums and pallet.

B1. A pallet with drums of spent adhesive in barrel storage area had abnormal amounts of dried adhesives on exterior of drums and floor of pallet.

Excess adhesive was scrapped from drums and pallet and placed in drums for disposal and responsible employees advised of proper containment of excess materials.

It is my sincere hope that this reply will serve to satisfy the requirements of the aforementioned report.

  
J. R. Dunahay - Manager  
Facilities Engineering

pd

cc: J. D. Unis  
G. A. Sattelmeier  
P. R. Gilezan  
R. F. Hurliman  
R. A. Cholish

STATE OF MICHIGAN



S.E. Michigan Field Office  
15500 Sheldon Road  
Northville, MI 48167

JAMES J. BLANCHARD, Governor

DEPARTMENT OF NATURAL RESOURCES

RONALD O. SKOOG, Director

November 4, 1985

NATURAL RESOURCES COMMISSION

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Mr. J. D. Unis, Plant Manager  
Chrysler Corporation  
Warren Stamping Plant  
22800 Mound Road  
Warren, Michigan 48901

Re: MID 980700868

Dear Mr. Unis:

On October 31, 1985, acting as a representative of the United States Environmental Protection Agency, I performed an inspection of your facility located at 22800 Mound Road, Warren, Michigan. The purpose of this inspection was to evaluate compliance of that facility with the requirements of Subtitle C of the Resource Conservation and Recovery Act (RCRA) as amended.

As a result of that inspection, it has been determined that the above facility is in violation of some of the requirements of subtitle (c) of RCRA. Specifically, the following was found:

1. A hazardous waste container in the "Waste Consolidation Area" was not stored closed as required in 40 CFR 265.173. Additionally, the words "Hazardous Waste" must be affixed to the container prior to receiving wastes.
2. The personnel training records must be updated to include a listing of individuals who require training in handling hazardous waste. This will assist in determining if all required training for personnel is completed.

You are requested to respond to this letter by November 22, 1985, providing documentation to this office regarding those actions taken to correct these violations. If you have any questions regarding this matter, please feel free to contact me at (313) 459-9180.

Sincerely,

A handwritten signature in cursive script, reading "Larry L. AuBuchon".

Larry L. AuBuchon  
Hazardous Waste Division

LLA:m1m

cc: U.S. EPA, Region V  
B. Okwumabua

enclosures

# RCRA INSPECTION REPORT

EPA Identification Number: M I D 9 8 0 7 0 0 8 6 8  
 Installation Name: Chrysler Corporation, Warren Stamping Plant  
 Location Address: 22800 Mound Road

City: Warren State: Michigan 48901

Date of Inspection 10/31/85 Time of Inspection (from) 1030 (to) 1230

Person(s) Interviewed	Title	Telephone
<u>Fred J. Gutt</u>	<u>Plant Engineer</u>	<u>(313) 497-3664</u>
_____	_____	_____
_____	_____	_____

Inspector(s)	Agency/Title	Telephone
<u>Larry A. Buchan</u>	<u>MDNR-HWD/WQS</u>	<u>(313) 459-9180</u>
_____	_____	_____

Installation Activity (mark only one box)	Inspection Form(s)
<input type="checkbox"/> Treatment/Storage/Disposal per 40 CFR §265.1 and/or Generation and/or Transportation	A
<input type="checkbox"/> Treatment/Storage/Disposal (No Generation or Transportation)	A
<input type="checkbox"/> Generation and Transportation	B,C
<input checked="" type="checkbox"/> Generation Only	B
<input type="checkbox"/> Transportation Only	C

cc: USEPA  
 B. Okwumabua

# INSPECTION FORM B

## Section A: Scope of inspection

Standards for generators of HAZARDOUS WASTE subject to 40 CFR 262.10

## Section B: MANIFEST REQUIREMENTS (Part 262, Subpart B)

	Yes	No	NI*	Remarks
(1) Does the generator have copies of the manifest available for review? 262.40	<u>X</u>			
(2) Examine manifests for shipments in past 6 months. Indicate approximate number of manifested shipments during that period. <u>13</u>				
(3) Do the manifest forms examined contain the following information? (If possible, make 262.21 copies of, or record information from, manifests that do not contain the critical elements)				
a. Manifest document number?	<u>X</u>			
b. Name, mailing address, telephone number, and EPA ID number of generator?	<u>X</u>			
c. Name and EPA ID number of transporter(s)?	<u>X</u>			
d. Name, Address, and EPA ID Number of designated permitted facility and alternate facility?	<u>X</u>			
e. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>X</u>			
f. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>			
g. Required certification?	<u>X</u>			
h. Required signatures?	<u>X</u>			
(4) Reportable exceptions 262.42				
a. For manifests examined in (2) (except for shipments within the last 35 days), enter the number of manifests for which the generator has NOT received a signed copy from the designated facility within 35 days of the date of shipment. <u>0</u>				
b. For manifests indicated in (4a), enter the number for which the generator has submitted exception reports (40 CFR 262.42) to the Regional Administrator. <u>0</u>				

Section C - PRE-TRANSPORT REQUIREMENTS  
(40 CFR Part 262 Subpart C)

	Yes	No	NI	Remarks
(1) Is waste packaged in accordance with DOT regulations? (Required prior to movement of hazardous waste off-site) 262.30	<u>X</u>	—	—	—
(2) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required prior to movement of hazardous waste off-site) 262.31 and 262.32	<u>X</u>	—	—	—
(3) If required, are placards available to transporter? 262.33	—	—	—	<u>transporter provides</u>
** (4) Pre-shipment Accumulation:				
** applies only to GENERATORS that store hazardous waste on-site for 90 days or less without a permit. These items do not apply to generators whose waste is immediately transported off-site.				
a. Is hazardous waste accumulated in containers? If no, skip to b. 262.34	<u>X</u>	—	—	—
i. Is each container clearly marked with the date on which the period of accumulation began?	<u>X</u>	—	—	<u>* Container - paint shop not dated</u>
ii. Have more than 90 days elapsed since the dates marked?	—	<u>X</u>	—	—
iii. Is each container labeled or marked clearly with the words "Hazardous Wastes?"	<u>X</u> *	—	—	<u>* Container - Waste Covered Area not covered &amp; labeled</u>
iv. Are containers in good condition?	<u>X</u>	—	—	—
v. Are containers compatible with waste in them?	<u>X</u>	—	—	—
vi. Are containers managed to prevent leaks?	<u>X</u>	—	—	<u>Waste adhesive should be scraped from outside of drum &amp; pallet.</u>
vii. Are containers stored closed?	<u>X</u> *	<u>X</u> *	—	<u>* see iii above</u>
viii. Are containers inspected weekly for leaks and defects?	<u>X</u>	—	—	—
ix. Are ignitable and reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive).	<u>X</u>	—	—	<u>ignitable</u>



	Yes	No	NI	Remarks
x. Are incompatible wastes stored in separate containers? (If not, the provisions of 40 CFR 265.17(b) apply.)			N/A	
xi. Are containers of incompatible waste separated or protected from each other by physical barriers or sufficient distance?			N/A	
b. Is hazardous waste accumulated in tanks? If no, skip to c. 262.34 (January 11, 1982 revision)		X		
i. Is each tank labeled or marked clearly with the words "Hazardous Wastes"? 262.34 (January 1982 revision)				
ii. Are tanks used to store only those wastes which will not cause corrosion, leakage or premature failure of the tank? 265.192				
iii. Do uncovered tanks have at least 60 cm (2 feet) of freeboard, or dikes or other containment structures?				
iv. Do continuous feed systems have a waste-feed cutoff?				
v. Are waste analyses done before the tanks are used to store a substantially different waste than before? 265.193				
vi. Are required daily and weekly inspections done? 265.194				
vii. Are reactive and ignitable wastes in tanks protected or rendered non-reactive or nonignitable? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or nonignitable, see treatment requirements.) 265.198				
viii. Are incompatible wastes stored in separate tanks? (If not, the provisions of 40 CFR §265.17(b) apply.) 265.199				

Yes No NI Remarks

- ix. Has the owner or operator observed the National Fire Protection Association's buffer zone requirements for tanks containing ignitable or reactive wastes?

Tank capacity: \_\_\_\_\_ gallons

Tank diameter: \_\_\_\_\_ feet

Distance of tank from property line \_\_\_\_\_ feet

(see tables 2-1 through 2-6 of NFPA's "Flammable and Combustible Liquids Code - 1977" to determine compliance.)

- c. Is hazardous waste accumulated in other than tanks or containers?

X \_\_\_\_\_ DOO7 spills accumulated process pit

- d. Personnel training. 262.34 (a) 5

Do personnel training records include: 265.16

- i. Job Titles?  
ii. Job Descriptions?  
iii. Description of training?  
iv. Records of training?  
v. Did personnel receive the required training by 5-19-81?  
vi. Do new personnel receive required training within six months?  
vii. Do personnel training records indicate that personnel have taken part in an annual review of initial training?

X \_\_\_\_\_ HW employees should be identified by dept. to ensure all receive appropriate training.  
X \_\_\_\_\_  
X \_\_\_\_\_  
X \_\_\_\_\_  
\_\_\_\_\_ X \_\_\_\_\_  
\_\_\_\_\_ X \_\_\_\_\_  
X \_\_\_\_\_

- e. Preparedness and Prevention 265. Subpart C

- i. Maintenance and Operation of Facility:

Is there any evidence of fire, explosion, or release of hazardous waste or hazardous waste constituent? 265.31

\_\_\_\_\_ X \_\_\_\_\_

Yes No NI Remarks

ii. If required, does this facility have the following equipment: 265.32

Internal communications or alarm systems?	<u>X</u>	___	___	___
Telephone or 2-way Radios at the scene of operations?	<u>X</u>	___	___	___
Portable fire extinguishers, fire control, spill control equipment and decontamination equipment?	<u>X</u>	___	___	___

Indicate the volume of water and/or foam available for fire control:

iii. Testing and Maintenance of Emergency Equipment: 265.33

Has the owner or operator established testing and maintenance procedures for emergency equipment?	<u>X</u>	___	___	___
Is emergency equipment maintained in operable condition?	<u>X</u>	___	___	___
iv. Has owner/operator provided immediate access to internal alarms (if needed)?	<u>X</u>	___	___	___
v. Is there adequate aisle space for unobstructed movement?	<u>X</u>	___	___	___
vi. Has the owner or operator attempted to make arrangements with local authorities in case of an emergency at the facility?	<u>X</u>	___	___	___

f. Contingency Plan and Emergency Procedures 265 Subpart D

Does the contingency plan contain the following information:

i. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.) 265.52

*Plan is being revised*

<u>X</u>	___	___	___
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	Yes	No	NI	Remarks
ii. Arrangements agreed to by local police departments, hospitals, contractors, and State and local emergency response teams to coordinate emergency services, pursuant to §265.37?	<u>X</u>	_____	_____	_____
iii. Names, addresses, and phone numbers (Office and Home) of all persons qualified to act as emergency coordinator.	<u>X</u>	_____	_____	_____
iv. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list, and a brief outline of its capabilities?	<u>X</u>	_____	_____	_____
v. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes and alternate evacuation routes?)	<u>X</u>	_____	_____	_____
vi. Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	_____	_____	_____
vii. Is the facility emergency coordinator identified?	<u>X</u>	_____	_____	_____
viii. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	_____	_____	_____
ix. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	_____	_____	_____
x. If an emergency situation has occurred at this facility, has the emergency coordinator followed the emergency procedures listed in 265.56?	_____	_____	_____	<u>no emergency</u>

Section D: RECORDKEEPING AND REPORTING (Part 262, Subpart D)

Yes No NI Remarks

- (1) Are all test results and analyses needed for hazardous waste determinations retained for at least three years? 262.40

X — — —

Section E: INTERNATIONAL SHIPMENTS (Part 262 Subpart E)  
262.50

- (1) Has the installation imported or exported hazardous waste? If "no", skip a and b.

— X — —

a. Exporting Hazardous Waste, has a generator:

i. Notified the Administrator in writing?

— — — —

ii. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

— — — —

iii. Met the Manifest requirements?

— — — —

b. Importing Hazardous Waste, has the generator met the manifest requirements?

— — — —

Remarks: \_\_\_\_\_

Waste accumulation areas:

1. Waste consolidation area - waste adhesives  
are scraped from drums & accumulation in  
containers. (DOO)
2. Paint Shop  
Solvent from spray paint operation (DOO)
3. Chrome process pit accumulates spills (DOO)

Drum storage area behind plant.